EXHIBIT A

EX	Description	Stipulations	Stipulations	T	I al a se A: fi a al	Admitted
#		_	_	-	Identified	
		authenticity	admissible		Ву	
1	September 13, 2016	Authentic				
	WLOS TV Story					
	(SINCLAIR0000234)					
2	"69 Year Old Woman			FRE 403 -		
	Punched in Face			cumulative; FRE		
	Outside Rally by Trump			802 - hearsay; FRE		
	Supporter," WLOS			805 - hearsay		
	(September 14, 2016)			within hearsay		
3	"69-Year-Old Woman					
	Punched at Donald					
	Trump Rally" The					
	Asheville Citizen-Times					
	(September 14, 2016)					
4	"Trump Pounces on			FRE 401, FRE 402;		
	Clinton Comments			FRE 403 -		
	About His Supporters,"			cumulative; FRE		
	The Asheville Citizen-			802 - hearsay; FRE		
	Times (September 14,			805 - hearsay		
	2016)			within hearsay		
5	September 15, 2016	Authentic				
	WLOS TV Story					
	(SINCLAIR0000235)					
6	"Lawyer for Man			FRE 401, FRE 402;		
	Accused of Attacking			FRE 403 -		
	Woman at Trump Rally			cumulative; FRE		
	Claims She's Lying,"			802 - hearsay; FRE		
	WLOS (September 15,			805 - hearsay		
	2016)			within hearsay		
7	"Lawyer Rebuts			FRE 401, FRE 402;		
	Woman's Story of			FRE 403 -		
	Being Punched After			cumulative; FRE		
	Trump Rally," The			802 - hearsay; FRE		
	Asheville Citizen-Times			805 - hearsay		
	(September 15, 2016)			within hearsay		

EX	Description	Stipulations	Stipulations	_		Admitted
#		_	_	-	Identified	
		authenticity	admissible		Ву	
8	"A Trump Protest			FRE 401, FRE 402;		
	Turns Violent," Letters			FRE 403 -		
	from the Left			cumulative; FRE		
	(September 15, 2016)			802 - hearsay; FRE		
				805 - hearsay		
				within hearsay		
9	"Asheville Trump Rally			FRE 403 -		
	Arrestees Get Charges,			cumulative; FRE		
	Court Dates," Asheville			802 - hearsay; FRE		
	Citizen-Times			805 - hearsay		
	(September 30, 2016)			within		
				hearsay; Jury		
				should not see		
				public figure		
				evidence		
10	"Undercover Video	Authentic				
	Claims Asheville					
	Woman Punched at					
	Trump Rally Was					
	Planted by DNC,"					
	WLOS (October 19,					
	2016)					
11	October 19, 2016	Authentic				
	WLOS TV Story					
	(SINCLAIR0000233)					
12	"Videos Put Democrats	Authentic				
	on Defensive About					
	Dirty Tricks," The New					
	York Times (October					
	20, 2016)					
13	"Asheville Trump Rally			FRE 403 -		
	Arrestee Going to			cumulative; FRE		
	Trial," Asheville Citizen-			802 - hearsay; FRE		
	Times (January 20,			805 - hearsay		
	2017)			within hearsay;		
				Jury should not		
				see public figure		
				evidence		

EX	Description	Stipulations	Stipulations	Objections	Idontified	Admitted
#		_	_		Identified	
		authenticity	admissible		Ву	
14	"Case Continued for			FRE 403 -		
	Asheville Trump Rally			cumulative; FRE		
	Arrestee," Asheville			802 - hearsay; FRE		
	Citizen-Times (March			805 - hearsay		
	16, 2017)			within hearsay;		
				Jury should not		
				see public figure		
				evidence		
15	March 16, 2017 WLOS			FRE 403 -		
	TV Story			cumulative; FRE		
	(SINCLAIR0000236)			802 - hearsay; FRE		
				805 - hearsay		
				within hearsay;		
				Jury should not		
				see public figure		
				evidence		
16	April 2017 WLOS TV	Authentic				
	Story					
	(SINCLAIR0000232)					
17	"Assault Charge			FRE 403 -		
	Dropped in Punch			cumulative; FRE		
	Outside Trump Rally,"			802 - hearsay; FRE		
	Associated Press (April			805 - hearsay		
	22, 2017)			within hearsay;		
				Jury should not		
				see public figure		
10	II) /: alamana at Turring			evidence		
18	· •			Jury should not		
	Rally," Chicago Daily			see public figure		
	Herald (September 13,			evidence		
19	2016) "Trump Fan Punches			FRE 403 -		
19	Ailing Woman, 69,"			cumulative; FRE		
	New York Daily News			802 - hearsay; FRE		
	(September 14, 2016)			805 - hearsay		
	(September 14, 2010)			within hearsay;		
				Jury should not		
				see public figure		
				evidence		
	L			Evidence		

EX	Description	Stipulations	Stipulations		I al a k :f: a al	Admitted
#		_	_		Identified	
		authenticity	admissible		Ву	
20	"Video shows			FRE 403 -		
	aftermath of 69-year			cumulative; FRE		
	old woman punched at			802 - hearsay; FRE		
	a Trump Rally" - LA			805 - hearsay		
	Times			within hearsay;		
				Jury should not		
				see public figure		
				evidence		
21	"Arrest warrant issued			FRE 403 -		
	in assault of woman,			cumulative; FRE		
	69, at Donald Trump			802 - hearsay; FRE		
	N.C. rally" -			805 - hearsay		
	www.chicagotribune.c			within hearsay;		
	om			Jury should not		
				see public figure		
				evidence		
22	"Police Want to Arrest			FRE 403 -		
	the Man Who Punched			cumulative; FRE		
	a Protester at a Donald			802 - hearsay; FRE		
	Trump Rally" - Time			805 - hearsay		
				within hearsay;		
				Jury should not		
				see public figure		
				evidence		
	lle			555 400		
23	"Protester With			FRE 403 -		
	Oxygen Tank Allegedly			cumulative; FRE		
	'Cold-Cocked' By			802 - hearsay; FRE		
	Trump Supporter at NC			805 - hearsay		
	Rally" - Huffington Post			within hearsay;		
				Jury should not		
				see public figure evidence		
24	"69-Year-Old Woman			FRE 403 -		
24	Punched In Face While			cumulative; FRE		
	Protesting at Trump			802 - hearsay; FRE		
	Rally" - The Telegraph			805 - hearsay		
	many - The relegiabil			within hearsay;		
				Jury should not		
				see public figure		
				evidence		
				evidence		

EX	Description	Stipulations	Stipulations	Objections		Admitted
#	P	_	_		Identified	
		authenticity	admissible		Ву	
25	"Report: Woman, 69,			FRE 403 -		
	punched in face by			cumulative; FRE		
	Trump supporter from			802 - hearsay; FRE		
	Edisto outside rally" -			805 - hearsay		
	WCIV			within hearsay;		
				Jury should not		
				see public figure		
				evidence		
26	"Assault charge			FRE 403 -		
	dropped in punch			cumulative; FRE		
	outside Trump			802 - hearsay; FRE		
	campaign rally" - San			805 - hearsay		
	Francisco Chronicle			within hearsay;		
				Jury should not		
				see public figure		
				evidence		
27	Photo of US Cellular					
	Center (Campbell Ex.					
	2)					
28	Photo of Teter					
	Standing with Sign (3)					
29	Teter Hug Photo					
	(Campbell.Teter					
20	Photos000003)					
30	Photo of Teter with					
21	Sign (Teter Ex. 2) Fiesser Video	Authentic				
	Still from Fiesser Video	Authentic				
32	(Teter Ex. 8)					
33	Still from Fiesser					
33	(Campbell.Teter					
	Photos000006)					
34	Still from MoveOn			Jury should not		
	(Campbell.Teter			see public figure		
	Photos000010)			evidence		
35	Photo of Teter's Face					
	(Teter Ex. 4)					
36	Teter medical records					
	from 237-351;361-					
	537;722-892;893-					
	909;923-950					

EX	Description	Stipulations	Stipulations		I d a m t i f i a d	Admitted
#	-	_	_	-	Identified	
		authenticity	admissible		Ву	
37	Teter's Answers to PV's Interrogatories and Requests for Production					
38	Teter's Supplemental Answers to PV's Interrogatories and Requests for Production	Authentic				
39	Teter's Second Supplemental Answers to PV's Interrogatories and Requests for Production	Authentic				
40	Teter's Answers and Supplemental Answers to Campbell's Interrogatories	Authentic				
41	Teter's Answers to Campbell's Requests for Admissions	Authentic				
42	O'Keefe's Interrogatories and Requests for Production	Authentic				
43	Comerford Ex. 7 - MoveOn 0000226- 0000229			Jury should not see public figure evidence		
44	September 14 MoveOn Email Chain (MOVEON0000209- MOVEON0000211) Comerford Ex 8			Jury should not see public figure evidence		
45	September 14, 2016 Email Chain (MOVEON0000272- MOVEON00000273)	Authentic		Jury should not see public figure evidence		

EX	Description	Stipulations	Stipulations	Objections	I de al Cond	Admitted
#	·	_	_		Identified	
		authenticity	admissible		Ву	
46	September 14-15	Authentic		Jury should not		
	Email Chain			see public figure		
	(MOVEON0000045-			evidence		
	MOVEON0000047)					
	Comerford Ex. 11					
47	September 14-15	Authentic		Jury should not		
	Email Chain			see public figure		
	(MOVEON0000057-			evidence		
	MOVEON0000059)					
48	September 14-15	Authentic		Jury should not		
	Email Chain			see public figure		
	(MOVEON0000136-			evidence		
	MOVEON0000138)					
49	September 14-15	Authentic		Jury should not		
	Email Chain			see public figure		
	(MOVEON0000024-			evidence		
	MOVEON0000026)					
	Comerford Ex. 10					
50	Release	Authentic		Jury should not		
	(MOVEON0000125)			see public figure		
				evidence		
51				Lack of foundation		
	(Meade Ex. 6)					
52	Facebook Print Out			Lack of foundation		
	(Meade Ex. 7)					
53	Facebook Print Out			Lack of foundation		
	(Meade Ex. 8)					
54	Facebook Print Out			Lack of foundation		
	(Meade Ex. 9)					
55	Facebook Print Out			Lack of foundation		
	(Meade Ex. 10)	-				
56	Facebook Print Out			Lack of foundation		
	(Meade Ex. 11)			11		
57	Facebook Print Out			Lack of foundation		
	(Meade Ex. 12)					
58				Lack of foundation		
	communications with					
<u> </u>	Streza	-				
59	Orozco Ex. 4 - picture			Lack of foundation		
	of face	<u> </u>				

EX	Description	Stipulations	Stipulations	T	I de el Cend	Admitted
#	-	_	_	-	Identified	
		authenticity	admissible		Ву	
60	Orozco Ex. 5 - Teter			Lack of foundation		
	with young man					
61	Orozco Ex. 6 - Teter			Lack of foundation		
	sitting in chair					
62	Videos of September					
	15, 2016 Meeting					
	(PVDEF0000987-					
	PVDEF0000993)					
63	Email re: Creamer Aug					
	23 2016 Fall plan					
	proposal					
	PVDEF0001015-1016					
64	AUFC Fall 2016 Plan to	Authentic				
	Motivate Voters -					
	PVDEF0001017-					
	0001023					
65	September 29, 2016					
	Email (PVDEF0005426-					
	PVDEF0005427)					
66	September 30, 2016					
	Email and attached					
	Proposal					
	Memorandum					
	(PVDEF0001916-					
	PVDEF0001920)					
67	Bromberg email to			FRE 401, FRE 402,		
	Streza - Teter 538			FRE 403; Lack of		
				foundation		
68	Streza email to			FRE 401, FRE 402,		
	Bromberg - Teter 539-			FRE 403; Lack of		
	60			foundation		
69				FRE 401, FRE 402,		
	Streza - Teter 542			FRE 403; Lack of		
				foundation		
70	Streza email to			FRE 401, FRE 402,		
	Bromberg - Teter 543-			FRE 403; Lack of		
	545			foundation		
71	Bromberg email to			FRE 401, FRE 402,		
	Streza - Teter 546-548			FRE 403; Lack of		
				foundation		

EX	Description	Stipulations	Stipulations	Objections		Admitted
#	•	· _	· –	•	Identified	
		authenticity	admissible		Ву	
72	Streza email to	-		FRE 401, FRE 402,		
	Bromberg - Teter 549-			FRE 403; Lack of		
	551			foundation		
73	Streza email to			FRE 401, FRE 402,		
	Bromberg - Teter 552			FRE 403; Lack of		
				foundation		
74	Streza email to			FRE 401, FRE 402,		
	Lindenbaum - Teter			FRE 403; Lack of		
	648-650			foundation		
75	Lindenbaum email to			FRE 401, FRE 402,		
	Streza - Teter - 651-			FRE 403; Lack of		
	653			foundation		
76	Streza email to			FRE 401, FRE 402,		
	Lindenbaum - Teter			FRE 403; Lack of		
	654-656			foundation		
77	Lindenbaum email to			FRE 401, FRE 402,		
	Streza - Teter - 657-			FRE 403; Lack of		
	659			foundation		
78	Email from Mateo	Authentic		FRE 805 - hearsay		
	Lives to Asheville News			within hearsay		
	dated September 12,					
	2006 - Sinclair					
	0000020					
79	September 15, 2016	Authentic		FRE 805 - hearsay		
	Evan Donavan Email to			within hearsay		
	&WLOS Need to Know -					
	Sinclair 0000055-60					
80	Photo of Teter Next to	Authentic				
	Man at Rally (Teter Ex.					
	1)					
81	Teter raw MoveOn	Authentic		Jury should not		
	video (Comerford Ex.			see public figure		
	23)			evidence		
	Fiesser Still Teter			FRCP 26, FRCP 37		
83	Fiesser Still Teter			FRE 901, FRE 1002		

EX	Description	Stipulations	Stipulations	Objections	Idontified	Admitted
#		_	-		Identified	
		authenticity	admissible		Ву	
100	November 18, 2018			FRE 401, FRE 402,		
	Email Streza to Foval			FRE 403; Lack of		
				foundation		
101	November 7, 2018			FRE 401, FRE 402,		
	Email Foval to Streza			FRE 403; Lack of		
				foundation		
301	Bernard Consulting			FRE 401, FRE 402,		
	agreement -			FRE 403; Lack of		
	(MOVEON0000324-			foundation; Jury		
	MOVEON0000330)			should not see		
	Bernard 1, Comerford			public figure		
	Ex 4			evidence		
302	September 14-15	Authentic		FRE 401, FRE 402,		
	Email Chain			FRE 403; Lack of		
	(MOVEON0000223-			foundation; Jury		
	MOVEON0000224)			should not see		
				public figure		
				evidence		
303	MoveOn Video			Jury should not		
	MOVEON0000336			see public figure		
				evidence		
304	MoveOn email from			Jury should not		
	Teter I was punched by			see public figure		
	Trump supporter-			evidence		
	Greenson Dep Ex. 2					
	Comerford Ex. 15					
305	MoveOn email from			Jury should not		
	Teter I was punched			see public figure		
	by Trump supporter			evidence		
	MOVEON0000293-294					
307	MoveOn email	Authentic		Jury should not		
	MOVEON0000067-70			see public figure		
	Comerford Ex. 13			evidence		

EX	Description	Stipulations	Stipulations	Objections	Idontific d	Admitted
#		_	_		Identified	
		authenticity	admissible		Ву	
308	September 14, 2016	Authentic		Jury should not		
	MoveOn Email Chain			see public figure		
	w/ release			evidence		
	MOVEON0000214-216					
	Comerford 5 and 6					
309	MoveOn email	Authentic		FRE 403 -		
	MOVEON0000119-124			misleading if it		
	Comerford Ex. 12			does not include		
				the reference to		
				page 125 (the		
				blank release		
				attached); Jury		
				should not see		
				public figure		
				evidence		